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	DISTRICT COURT
DISTRICT OF NEVADA	
JAMES C. SEXTON JR. and ESQUIRE GROUP LLC,	
Plaintiffs,	Civil No. 2:13-cv-00893-JCM-(VCF)
v.	, ,
KAREN L. HAWKINS, Director of Office of Professional Responsibility, Internal	
Revenue Service, Department of Treasury,	
Defendant.	
_	to Respond and Reply Re Motion for the Pleadings
	_
(First	request)
	Acting Assistant Attorney General W. CARL HANKLA Trial Attorney, Tax Division U.S. Dept. of Justice PO Box 683 Washington, DC 20044 Telephone: (202) 307-6448 Fax: (202) 307-0054 w.carl.hankla@usdoj.gov Attorneys for the United States of America  DANIEL G. BOGDEN U.S. Attorney, District of Nevada Of Counsel  UNITED STATES DISTRICT  JAMES C. SEXTON JR. and ESQUIRE GROUP LLC, Plaintiffs, v.  KAREN L. HAWKINS, Director of Office of Professional Responsibility, Internal Revenue Service, Department of Treasury, Defendant.

1	IT IS HEREBY STIPULATED AND AGREED by the plaintiffs and by the defendant	
2	(the United States of America) that, with respect to the Motion for Judgment on the Pleadings	
3	filed by the plaintiffs on November 9, 2015:	
4	1. The United States may have an extension of time to December 23, 2015 in	
5	which to file and serve its response.	
6	2. The plaintiffs may have an extension of time to January 12, 2016 in which	
7	to file and serve their reply.	
8	The reason for the extensions is to allow time for government counsel to consult with	
9	agency counsel from the office of the Chief Counsel, Internal Revenue Service, before filing the	
10	United States' response, and to allow time for plaintiffs to file their reply after the holiday	
11	season.	
12	DATED this 18th day of November, 2015.	
13	CAROLINE D. CIRAOLO	
14	Acting Assistant Attorney General	
	/s/ W. Carl Hankla	
15	W. CARL HANKLA Trial Attorney, Tax Division	
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18	Attorneys for the United States of America	
19	DANIEL G. BOGDEN	
20	United States Attorney	
	District of Nevada  Of Counsel	
21		
22	2	

1 DATED this 18th day of November, 2015. 2 /s/ Desa Ballard DESA BALLARD 3 Ballard & Watson P.O. Box 6338 West Columbia, South Carolina 29171 4 Telephone: (803) 796-9299 5 Fax: (803) 796-1066 Email: desab@desaballard.com SHAWN R. PEREZ 6 Law Office of Shawn R. Perez 633 So. Fourth Street, Suite 7 7 Las Vegas, Nevada 89101 8 Telephone: (702) 485-3977 Email: shawn711@msn.com 9 Attorneys for James C. Sexton, Jr. /s/ Puoy K. Premsrirut 10 PUOY K. PREMSRIRUT 11 Brown Brown & Premsrirut 520 So. Fourth Street, Second Floor 12 Las Vegas, Nevada 89101 Telephone: (702) 384-5563 Fax: (702) 385-1752 13 Email: puoy@brownlawlv.com Attorney for Esquire Group LLC 14 15 IT IS SO ORDERED that the United States (the defendant) may have an extension of 16 time through December 23, 2015 in which to respond to the Motion for Judgment on the Pleadings, and that the plaintiffs may have an extension of time through January 12, 2016 in 17 18 which to file their reply. 19 RICHARD F. BOULWARE, II United States District Judge 20 21 DATED: November 22, 2015.

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1 **CERTIFICATE OF SERVICE** I HEREBY CERTIFY that service of the foregoing has been made by the Court's 2 CM/ECF system to: 3 DESA BALLARD 4 desab@desaballard.com Attorney for James C. Sexton Jr. 5 SHAWN R. PEREZ Shawn711@msn.com 6 Attorney for James C. Sexton Jr. 7 PUOY K. PREMSRIRUT puoy@brownlawlv.com 8 Attorney for Esquire Group LLC 9 /s/ W. Carl Hankla W. CARL HANKLA 10 Trial Attorney, Tax Division U.S. Department of Justice 11 12 13 14 15 16 17 18 19 20 21

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